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STATE BAR NUMBER 5736  
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ELECTRONICALLY FILED  
7-3-25

4 Attorney for Debtor

5 UNITED STATES BANKRUPTCY COURT  
6 FOR THE DISTRICT OF NEVADA

7 \* \* \*

8 IN RE:  
PERRY L. SISCO

Case No. BK-N-25-50344-HLB  
(Chapter 13)

**OPPOSITION TO DISMISSAL**

HEARING DATE: 7-17-25

HEARING TIME: 3:00 p.m.

TIME REQUIRED: 2 Minutes

9  
10 Debtors.  
11 \_\_\_\_\_/

12 COMES NOW, the debtor, by and through her attorney, Sean P.  
13 Patterson, Esq. and opposes the Chapter 13 Trustee's (hereinafter  
14 "Movant") Motion to Dismiss. This reply is brought pursuant to  
15 the Points and Authorities included herein, and on further oral  
16 argument of counsel as may be presented at the time of hearing.  
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POINTS AND AUTHORITIES**I. FACTS**

This was case filed on or about April 15, 2025. The plan was filed on the same day. The case was filed to allow the debtor to reorganize his unsecured debts and save his home from foreclosure for taxes. The plan confirmation hearing is set for August 21, 2025. The plan will need to be amended.

Since the filing of the case, the debtor has turned over the required documents. Mr. Sisco attended the 341 hearing. Mr. Sisco testified that he did not have to file taxes, as he did not have income. More importantly, there has been a change in circumstances. Mr. Sisco has been able to restart his landscape business. He is now getting Social Security. His live-in girlfriend has found work. Thus, the household has more income.

**II. LEGAL ARGUMENT**

The myriad of reasons to dismiss a Chapter 13 case are enumerated in the Bankruptcy Code. 11 U.S.C. §1307(c).

Mr. Sisco attended and completed the 341 hearing. As stated above, his household income has increased since the filing of this case. The debtor mailed a payment to the Trustee last week. However, it has not posted as of the filing of this document.

Counsel requests that this motion be denied. In the alternative, continue the hearing to the August confirmation hearing.

RESPECTFULLY SUBMITTED this 3rd day of July 2025.

/s/ SEAN P. PATTERSON, ESQ.  
SEAN P. PATTERSON, Esq.

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure, Rule 5(b), I hereby certify that I am an employee of the law firm of **SEAN P. PATTERSON**, 232 Court Street, Reno, Nevada 89501; and that on this date, I mailed a true and correct copy of the foregoing document via the United States mail, postage prepaid to:

Perry L. Sisco  
9320 N. Virginia Street  
Reno, Nv. 89506

This document was sent via electronic mail to:

William Van Meter  
c13ecf@nvgbell.net

DATED: July 3, 2025

/s/ Sean P. Patterson  
SEAN P. PATTERSON, ESQ.